



Orbital Response to FCC 13-65 ET Docket No. 13-115 Part IV. Notice of Inquiry

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NOI Comments

- Regarding NOI comments from FCC 13-65, Part IV, Paragraph 88

‘Are there communications needs during other portions of space missions after the launch such as during re-entry or the “on orbit” phase of a mission that require changes in allocations?’

Response:

Orbital Corporation will provide International Space Station resupply missions with their Cygnus Resupply Space Vehicle. The Cygnus missions utilize frequencies in ‘S’ band 2200 MHz to 2290 MHz band. Presently the FCC authorizes Orbital the use of ‘S’ band frequencies by Special Temporary Authorizations (STAs). Such authorizations have been issued for the first two of nine Cygnus missions; designated Orb-D1 and Orb-1. STAs call signs are WF9XMG for Orb-D1, and WG9XSR for Orb-1.

Long term licensing is highly desired for future Cygnus missions. Orbital recommends the FCC consider adding a non-Federal co-primary allocation for the 2200-2290 MHz band to the ‘Table of Frequency Allocations’. This would be a first step in opening consideration for licensing.

Our Cygnus missions are defined commercial based on the nature of the re-supply contract between Orbital and NASA, however the mission is truly a government mission specific to the ISS resupply. Based on the criticality that these missions happen as scheduled and with operational excellence, it is important to work to long term licenses that can minimize the level of interference and risk of grant rejection. A license will also significantly reduce the number of filings for frequency usage. A license can be issued for years vs the 6 month to year maximum time frame for an STA.

Orbital understands that use of the 2200 to 2290 MHz band requires coordination with the Federal incumbents in the band, however still finds significant benefits as noted that will result from licensing.